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August 26, 2015

VIA FEDERAL EXPRESS

Blake Harrop
Antitrust Bureau
Office of the Illinois Attorney General
100 West Randolph Street
Chicago, Illinois 60601
E-Mail: bharrop@atg.state.il.us

Re: *State of Illinois v. Hitachi Ltd., et al.*, Case No. 12-CH-35266

Dear Mr. Harrop:

Enclosed please find a disc containing certain materials produced in response to the State of Illinois' document requests and interrogatories served on Defendants on April 21, 2015. The Defendants are coordinating their production, and the enclosed disc includes the first installment of materials that Panasonic Corporation, Panasonic Corporation of North America ("PNA"), and MT Picture Display Co., Ltd. ("MTPD," collectively, the "Panasonic Defendants") have agreed to produce on behalf of Defendants. Specifically:

- Deposition transcripts, exhibits and errata for the following Panasonic Defendants' witnesses deposed in the *In re CRT Antitrust Litigation*, Case No. 07-5944, MDL 1917 (N.D. Cal.): Muramatsu, Masashi; Kinoshita, Ayumu; Iwamoto, Shinichi; Chang, Allen (Zhang, Yu-Hao); Nishiyama, Hirokazu; Shyu, Michael (Hsu, Chih-Yen); Sanogawaya, Masaki; Nakano, Takashi; Wolff, Edwin; Kimura, Masahiro; Nowicki, Robert; Tobinaga, Tatsuo; Nishiyama, Hirokazu.

This production also includes the following documents and written discovery in response to the document requests and interrogatories served on Panasonic Defendants:

- Documents bearing Bates numbers PNA-0000001-PNA-0017751; PNA-0017752; PNA-0027158-PNA-0027181; MTPD-0122906; PAN0000370-PAN0000516.
- Objections and Responses of PNA, MTPD and Panasonic Corporation to Direct Purchaser Plaintiffs' ("DPPs") First Set of Interrogatories, dated May 12, 2010;
- Supplemental Responses and Objections of PNA, MTPD and Panasonic Corporation to DPPs' First Set of Interrogatories, dated December 17, 2010;



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- Second Supplemental Responses and Objections of PNA, MTPD, and Panasonic Corporation to DPPs' First Set of Interrogatories, dated November 3, 2011;
- Objections and Responses of Defendants PNA, MTPD and Panasonic Corporation to Plaintiff Hawel A. Hawel's (D/B/A/ City Electronics) Second Set of Interrogatories, dated November 7, 2011;
- Responses and Objections of Defendants PNA, MTPD and Panasonic Corp. to Sharp Plaintiffs First Set of Interrogatories, dated October 24, 2013;
- Defendant MTPD's Objections and Responses to Sharp Plaintiffs First Request for Admissions ("RFAs"), dated June 30, 2014;
- Defendant MTPD's Objections and Responses to Sharp Plaintiffs First Set of Interrogatories, dated June 30, 2014;
- Defendant Panasonic Corporation's Objections and Responses to Sharp Plaintiffs First Set of Interrogatories, dated June 30, 2014;
- Defendant Panasonic Corporation's Objections and Responses to Sharp Plaintiffs First Set of RFAs, dated June 30, 2014;
- PNA's Objections and Responses to Sharp Plaintiffs First RFAs, dated June 30, 2014;
- Defendant PNA's Objections and Responses to Sharp Plaintiffs First Set of Interrogatories, dated June 30, 2014;
- Objections and Responses of Defendants PNA, MTPD and Panasonic Corporation to Direct Action Plaintiffs' ("DAPs") First Set of Interrogatories, dated July 10, 2014;
- Objections and Responses of Defendants PNA, MTPD and Panasonic Corporation to DAPs' First RFA's, dated July 10, 2014;
- Defendant MTPD's Objections and Responses to Target Corp.'s First RFAs, dated September 2, 2014;
- Defendant MTPD's Objections and Verified Responses to Target Corp.'s First Set of Interrogatories, dated September 2, 2014;
- Defendant Panasonic Corporation's Objections and Responses to Target Corp.'s First RFAs, dated September 2, 2014;
- Defendant Panasonic Corporation, F/K/A Matsushita Electric Industrial Co., Ltd.'s Objections and Verified Responses to Target Corp.'s First Set Of Interrogatories, dated September 2, 2014;

- Defendant PNA's Objections and Responses to Target Corp.'s First RFAs, dated September 2, 2014;
- Defendant PNA's Objections and Verified Responses to Target Corp.'s First Set of Interrogatories, dated September 2, 2014;
- Objections and Responses of Defendants Panasonic Corporation, PNA, and MTPD to DAPs' and Indirect Purchaser Plaintiffs' ("IPPs") First RFAs, dated September 3, 2014;
- Objections and Responses of Defendants PNA, MTPD and Panasonic Corp. to DAPs' Second RFAs, dated September 3, 2014;
- Objections and Responses of Defendants Panasonic Corporation, PNA and MTPD to Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust's First Set of Interrogatories, dated September 3, 2014;
- Objections and Responses of Defendant MTPD to IPPs' First Set of Interrogatories to All Defendants, dated September 4, 2014;
- Objections and Responses of Defendant Panasonic Corporation to IPPs' First Set of Interrogatories to All Defendants, dated September 4, 2014;
- Objections and Responses of Defendant PNA to IPPs' First Set of Interrogatories to All Defendants, dated September 4, 2014;
- Objections and Responses of Defendants Panasonic Corporation, PNA, and MTPD to IPPs' First RFAs, dated September 4, 2014;
- Objections and Responses of Defendants Panasonic Corporation, PNA, and MTPD to IPPs' First Set of Interrogatories, dated September 4, 2014;
- Objections and Responses of Defendants Panasonic Corporation, PNA, and MTPD to DAPs' Second Set of Interrogatories, dated September 5, 2014;
- Panasonic Corporation, PNA and MTPD, Supplemental Responses to Interrogatory Nos. 1, 3-7, and 11-12 of the IPPs' First Set of Interrogatories, dated October 10, 2014;
- Supplemental Objections and Responses of Defendant MTPD to IPPs' First Set of Interrogatories to all Defendants, dated October 17, 2014;
- Supplemental Objections and Responses of Defendant Panasonic Corporation to IPPs' First Set of Interrogatories to all Defendants, dated October 17, 2014;
- Supplemental Objections and Responses of Defendant PNA to IPPs' First Set of Interrogatories to all Defendants, dated October 17, 2014;



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- Objections and Responses of Defendants Panasonic Corporation, PNA and MTPD To DAPs' and IPPs' First RFAs, dated November 7, 2014;
- Supplemental Responses Of Defendants Panasonic Corporation, PNA, and MTPD To DAPs' and IPPs' First RFAs, dated December 5, 2014.

Please note that certain of these documents have been designated Confidential or Highly Confidential under the MDL Protective Order, which Samsung SDI provided to you on May 22, 2015. The enclosed materials are now being produced subject to the May 28, 2013 Protective Order in this case ("IL Protective Order"), and any confidentiality designations appearing on the enclosed materials from the MDL are also the same confidentiality designations that are being made for their production in this case. These materials are being produced subject to their designation and treatment as protected materials under the IL Protective Order.

Please do not hesitate to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "James F. Herbison", with a large, stylized flourish extending to the right.

James F. Herbison

*Counsel for Panasonic Corporation, Panasonic Corporation
of North America, and MT Picture Display Co., Ltd.*

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July 10, 2015

VIA E-MAIL AND FEDEX

Blake L. Harrop, Esq.
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Antitrust Bureau
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100 West Randolph Street
Chicago, IL 60601
bharrop@atg.state.il.us

Re: *State of Illinois v. Hitachi Ltd., et al.*, Case No. 12-CH-35266

Dear Blake:

On behalf of Toshiba Corporation, enclosed please find two (2) disks containing copies of non-privileged documents, discovery responses, deposition transcripts (with exhibits), and certain expert reports from the case captioned *In re: Cathode Ray Tube (CRT) Antitrust Litigation*, Case No. 07-5944 SC, MDL No. 1917 (N.D. Cal.) (the "MDL") that are responsive to the State of Illinois's First Set of Document Requests and First Set of Interrogatories. The defendants in the State's action are coordinating their production of materials from the MDL.

The enclosed disks contain the following:

- i. Documents bates-labeled TSB-CRT-00061306 through TSB-CRT-00061317, TAIS-CRT-00000970, and TACP-CRT-00000045 through TACP-CRT-00000065;
- ii. Copies of Toshiba Corp.'s responses to the discovery requests propounded by Plaintiffs in the MDL;
- iii. Transcripts (with exhibits) of the Rule 30(b)(6) depositions of Toshiba Corp., Toshiba America Information Systems, Inc., and Toshiba America Consumer Products, L.L.C. that were taken in the MDL;
- iv. Transcripts (with exhibits) of the Rule 30(b)(6) depositions of ABC Appliance, Inc. d/b/a ABC Warehouse, MARTA Cooperative of America, Inc., P.C. Richard & Son Long Island Corporation, Sears, Roebuck and Co., and Kmart Corp. that were taken in the MDL;

- v. Transcripts (with exhibits) of the Rule 30(b)(6) depositions of the Direct Purchaser Plaintiffs' class representatives Hawel A. Hawel, d/b/a City Electronics, Royal Data Services, Inc., Arch Electronics, Inc., Princeton Display Technologies, Inc., Studio Spectrum, Inc., Crago, d/b/a Dash Computers, Inc., Wettstein and Sons, Inc., d/b/a Wettstein's, Meijer, Inc. and Meijer Distribution, Inc., Nathan Muchnick, Inc., and Radio & TV Equipment, Inc., that were taken in the MDL;
- vi. Transcripts (with exhibits) of the depositions of Norio Fujita, Tomoyuki Kawano, Jack Milliken, Kazuhiro Nishimaru, Kazutaka Nishimura, Shinichiro Tsuruta, and Yasuki Yamamoto that were taken in the MDL;
- vii. Transcripts (with exhibits) of the depositions of ABC Appliance, Inc. d/b/a ABC Warehouse employees Daniel Schuh, David Dirven, Gary Vigneau, Gus Tanas, Martin Hartunian, and Mike Bone that were taken in the MDL;
- viii. Transcripts (with exhibits) of the depositions of current or former MARTA Cooperative of America, Inc. employees Aimee Fields, Warren Mann, and Jeff Sokol that were taken in the MDL;
- ix. Transcripts (with exhibits) of the depositions of P.C. Richard & Son Long Island Corporation employees Chris Parolisi Gregg Richard, John Bogdanos, and John LaRegina that were taken in the MDL;
- x. Transcripts (with exhibits) of the depositions of current or former Sears, Roebuck and Co., or Kmart Corp. employees Charles Bacon, Glenna Hess, Jacqueline Blackmond, Mike Jemo, Paula Paquette, Roger Teel, Sara LaPorta, and Shelly Karam that were taken in the MDL;
- xi. Transcript (with exhibits) of the deposition of Technologies Displays Americas, LLC employee Albino Bessa that was taken in the MDL;
- xii. Transcript (with exhibits) of the deposition of Edward A. Snyder that was taken in the MDL;
- xiii. Transcripts (with exhibits) of the depositions of Dennis W. Carlton that were taken in the MDL;
- xiv. Transcripts (with exhibits) of the depositions of Kenneth G. Elzinga that were taken in the MDL;
- xv. Surrebuttal Report of Edward A. Snyder, dated November 6, 2014; and
- xvi. Erratas to Reply Expert Reports of Dennis W. Carlton, dated September 23, 2014, and Expert Surrebuttal Reports of Dennis W. Carlton, dated November 26, 2014, from the MDL.

Please note that the documents, deposition transcripts, exhibits, and expert reports described in romanettes i, ii, iii, vi, xii, and xiii above have been designated "Confidential" or "Highly Confidential" under the May 28, 2013 Protective Order. The other documents, deposition transcripts, and exhibits have been designated "Confidential" or "Highly Confidential" under the June 18, 2008 Stipulated Protective Order issued in the MDL, and are now being produced

Blake L. Harrop, Esq.

WHITE & CASE

subject to the May 28, 2013 Protective Order; that is, the confidentiality designations appearing on the enclosed materials from the MDL are the same confidentiality designations under the May 28, 2013 Protective Order, and these materials are being produced subject to their designation and treatment as protected materials under the May 28, 2013 Protective Order.

Please let me know if you have any questions about these materials.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Dana E. Foster', with a long, sweeping horizontal line extending to the right.

Dana E. Foster

Enclosures

SheppardMullin

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February 2, 2016

File Number: 08Z8-134298

VIA FEDEX

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Re: State of Illinois v. Hitachi Ltd., et al., Case No. 12-CH-35266

Dear Blake:

Enclosed please find a disc containing certain materials in response to the State of Illinois's document requests. The defendants are coordinating their production, and the enclosed disc includes certain materials allocated to the Samsung SDI¹ defendants for production.

- Dr. Netz's MDL² deposition transcripts, and exhibits;
- The MDL expert reports of Dr. Netz;

Please note that certain of these documents have been designated Confidential or Highly Confidential under the MDL Protective Order, which Samsung SDI provided to you on May 22, 2015. The enclosed materials are now being produced subject to the May 28, 2013 Protective Order in this case ("IL Protective Order"), and any confidentiality designations appearing on the enclosed materials from the MDL are also the same confidentiality designations that are being made for their production in this case. These materials are being produced subject to their designation and treatment as protected materials under the IL Protective Order.

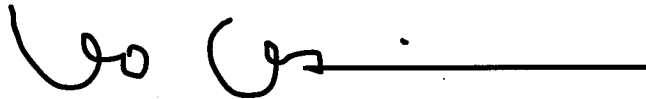
¹ Samsung SDI refers to defendants Samsung SDI America, Inc., and Samsung SDI Co., Ltd.

² MDL refers to *In re CRT Antitrust Litigation*, Case No. 07-5944, MDL 1917 (N.D. Cal.).

Blake Harrop
February 2, 2016
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Please do not hesitate to contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Leo Caseria", followed by a horizontal line.

Leo D. Caseria
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

Counsel for Samsung SDI America, Inc., and
Samsung SDI Co., Ltd.

SMRH:474838377.1
Enclosures